

EXHIBIT A

DECLARATION OF SEAN A. MOYNIHAN, ESQ.
IN SUPPORT OF DEFENDANTS' MOTION FOR SANCTIONS- 5
00084322;1

KLEIN ZELMAN ROTHERMEL LLP
485 MADISON AVE., 15TH FL., NEW YORK, NY 10022

KLEIN, ZELMAN, ROTHERMEL & DICHLER, L.L.P.

485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803TEL (212) 935-6020
FAX (212) 753-8101
e-mail: kzrd@kzrd.comInv# 1020410
Date 10/10/06
02683.00006-DOKIMPULSE MARKETING GROUP, INC.
ATT: Harvey Botvinick
5887 Glenridge Dr.
Suite 400
Atlanta, GA 30328

Re: GORDON WA LITIGATION

FOR PROFESSIONAL SERVICES RENDERED AS FOLLOWS:

Hours Amount

Redacted

8/12/06 SAM	review unauthorized second amended complaint; legal research re: nullifying pleading and striking same; sanctions and notice of rejection;	2.40	1,188.00
9/12/06 SKW	Review plaintiff's second amended complaint; confer with S. Moynihan and P. Glantz re: plaintiff's papers; research re: sanctions	4.00	900.00

DECLARATION OF SEAN A. MOYNIHAN, ESQ.
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8/12/06 SAM	review unauthorized second amended complaint; legal research re: nullifying pleading and striking same; sanctions and notice of rejection;	2.40	1,188.00
9/12/06 SKW	Review plaintiff's second amended complaint; confer with S. Moynihan and P. Glantz re: plaintiff's papers; research re: sanctions	4.00	900.00

DECLARATION OF SEAN A. MOYNIHAN, ESQ.
IN SUPPORT OF DEFENDANTS' MOTION FOR SANCTIONS- 7
00084322;1KLEIN ZELMAN ROTHERMEL LLP
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KLEIN, ZELMAN, ROTHERMEL & DICKER, L.L.P.

Schedule of Services Rendered
and/or Expenses AdvancedPage 2
Inv# 1020410
Date 10/10/06
02683.00006-DOK

Re: GORDON WA LITIGATION

Hours Amount

Redacted

9/13/06 SAM

1.80 891.00

review new pleading and
research dismissal and sanctions;

9/13/06 SKW

Email correspondence with local counsel
re: objection; draft and file objection
to unauthorized pleading;

3.80 855.00

Redacted

9/14/06 SAM

2.30 1,138.50

confer with local counsel re:
dismissal of unauthorized second amended
complaint;

Redacted

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and/or Expenses AdvancedPage 3
Inv# 1020410
Date 10/10/06
02683.00006-DOK

Re: GORDON WA LITIGATION

	Redacted	Hours	Amount
9/15/06 SAM	Redacted legal research on sanctions;	2.30	1,138.50

9/18/06 SAM	Redacted continue research on 2nd Amended Complaint being rendered a nullity; work on sanctions issues;	2.40	1,188.00
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9/20/06 SAM	Redacted Review filed documents including unauthorized Second Amended Complaint and rejection thereof;	.80	396.00
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9/22/06 SKW	Redacted Research re: sanctions motion;	.90	202.50
9/26/06 SKW	Email correspondence with local counsel re: safe harbor; research re: sanctions;	.30	67.50

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Re: GORDON WA LITIGATION

		Hours	Amount
9/27/06	SKW Draft brief in support of sanctions; research re: sanctions; email correspondence with local counsel re: sanctions procedures;	3.50	787.50
9/28/06	SAM work on sanctions issues and striking 2nd Amended Complaint; ;	1.80	891.00
9/28/06	SKW Draft motion and brief in support of sanctions;	3.20	720.00

Redacted

Wire Transfer Information:
Sterling National Bank & Trust Co. of N.Y.
425 Park AvenueDECLARATION OF SEAN A. MOYNIHAN, ESQ.
IN SUPPORT OF DEFENDANTS' MOTION FOR SANCTIONS- 10
00084322;1KLEIN ZELMAN ROTHERMEL LLP
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KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.

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and/or Expenses Advanced

Page 5
Inv# 1020410
Date 10/10/06
02683.00006-DOK

Re: GORDON WA LITIGATION

New York, New York 10022

ABA Code:

Account No.:

For the account of: Klein, Zelman, Rothermel & Dichter, L.L.P.

Redacted

DECLARATION OF SEAN A. MOYNIHAN, ESQ.
IN SUPPORT OF DEFENDANTS' MOTION FOR SANCTIONS- 11
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KLEIN ZELMAN ROTHERMEL LLP
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KLEIN, ZELMAN, ROTHERMEL & DICHLER, L.L.P.

485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803TEL (212) 935-6020
FAX (212) 753-8101
e-mail: kzrd@kzrd.comInv# 1020796
Date 11/09/06
02683.000006-DOKIMPULSE MARKETING GROUP, INC.
ATT: Harvey Botvinick
5887 Glenridge Dr.
Suite 400
Atlanta, GA 30328

Re: GORDON WA LITIGATION

FOR PROFESSIONAL SERVICES RENDERED AS FOLLOWS:

	Hours	Amount
10/02/06 SAM Work on motion for sanctions;	1.40	693.00
10/03/06 SAM Work on declaration; motion and memorandum and order for sanctions for unlawful pleading;	1.80	891.00
10/03/06 SKW Draft Moynihan Declaration, Motion for Sanctions and Proposed Order Granting Sanctions;	1.70	382.50
10/04/06 SKW Revise and serve Motion for Sanctions, Moynihan Declaration, Memorandum in Support of Motion and Proposed Order;	.60	135.00
10/10/06 SAM Review and opposition to motion to amend; review safe harbor motion for sanctions;	1.80	891.00
10/10/06 SKW Confer with S. Moynihan; review correspondence received from Siegel re: sanctions motion;	.30	67.50

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Page 2
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Re: GORDON WA LITIGATION

		Hours	Amount
10/16/06 SKW	Review motion for leave to amend and supporting papers filed by Plaintiff;	.20	45.00
10/18/06 SAM	Legal research re: opposing motion to amend 1st Amendment Complaint; review motion for leave.	1.60	792.00
10/18/06 SKW	Review of local rules re: time to oppose plaintiff's motion for leave to amend; review plaintiff's motion;	.80	180.00
10/19/06 SAM	Legal research re: standards for opposing leave to amend pleadings;	1.20	594.00
10/19/06 SKW	Research re: opposition motion and Rule 11; confer with P. Glantz re: research and opposition memo;	3.30	742.50
Redacted			
10/20/06 SAM	Continue opposition to amendment of pleading;		
Redacted			
10/23/06 SAM	oppose motion to amend;	2.60	1,287.00
10/23/06 SKW	Research and draft opposition to motion for leave to amend; draft Moynihan Declaration; file and serve opposition	4.50	1,012.50

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Schedule of Services Rendered
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Inv# 1020796
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Hours Amount

and declaration;

Redacted

10/26/06 SKW	Review plaintiff's reply memorandum in support of motion for leave to amend;	1.00	225.00
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Redacted

10/30/06 SAM	draft final safe harbor/sanctions letter;	1.80	891.00
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Redacted

DECLARATION OF SEAN A. MOYNIHAN, ESQ.
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KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.

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New York, New York 10022

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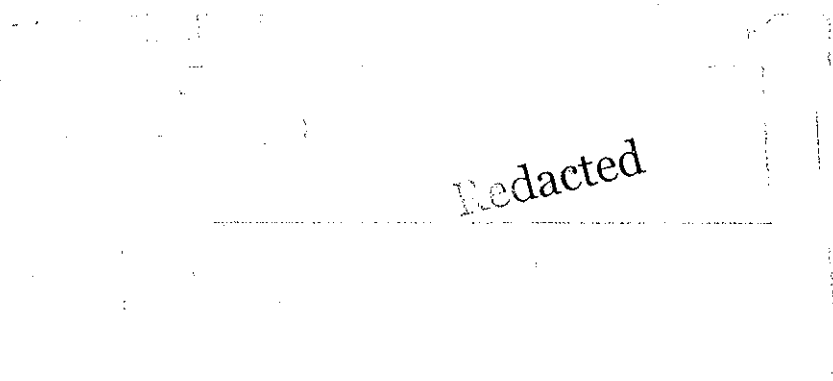
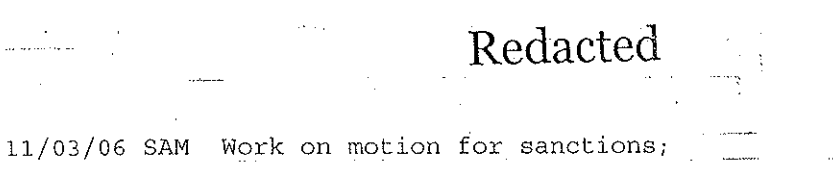
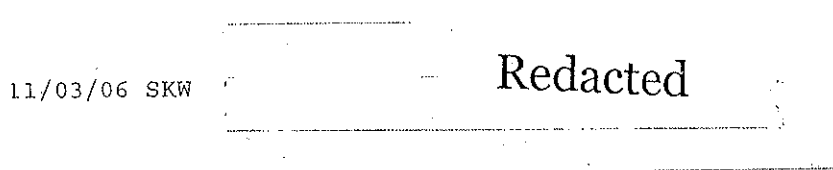
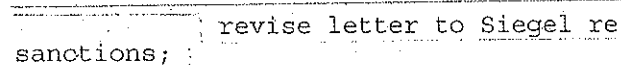
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485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803TEL (212) 935-6020
FAX (212) 753-8101
e-mail: kzrd@kzrd.comInv# 1021202
Date 11/20/06
02683.00006-DOKIMPULSE MARKETING GROUP, INC.
ATT: Harvey Botvinick
5887 Glenridge Dr.
Suite 400
Atlanta, GA 30328

Re: GORDON WA LITIGATION

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	Hours	Amount
		
11/02/06 SKW Confer with S. Moynihan re: sanctions motion; draft letter to Siegel re: sanctions;	.60	135.00
		
11/03/06 SAM Work on motion for sanctions;	2.60	1,287.00
		
11/03/06 SKW  revise letter to Siegel re: sanctions;	3.50	787.50

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KLEIN, ZELMAN, ROTHERMEL & DICLIER, L.L.P.

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Inv# 1021202
Date 11/20/06
02683.00006-DOK

Re: GORDON WA LITIGATION

Hours Amount

Redacted

11/06/06 SKW Revise letter to Siegel re: sanctions; .70 157.50

11/07/06 SKW Finalize letter to Siegel; .20 45.00

11/08/06 SKW Revise, file and serve sanctions motion 1.00 225.00
and supporting papers;

Redacted

11/09/06 SKW Confer with P. Glantz re: notice of .70 157.50
hearing; re-file notice of hearing for
sanctions motion; confer with S.

Redacted

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New York, New York 10022

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485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803TEL (212) 935-6020
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Atlanta, GA 30328

Re: GORDON WA LITIGATION

FOR PROFESSIONAL SERVICES RENDERED AS FOLLOWS:

	Hours	Amount
11/20/06 SKW Redacted	1.50	337.50
review plaintiff's opposition to sanctions motion;		
11/21/06 SKW Draft reply memorandum in support of defendants' sanctions motion;	2.50	562.50
11/22/06 SKW Continue drafting reply memorandum; draft Moynihan Declaration in Support of Sanctions;	4.00	900.00
11/27/06 SAM Review and revise file reply in support of motion for sanctions;	1.20	594.00

Redacted

Total Services

KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.

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